

Nos. 23-1394, 23-1452

In the
United States Court of Appeals
for the Fourth Circuit

JESSE HAMMONS,
Plaintiff-Appellant-Cross-Appellee,

v.

UNIVERSITY OF MARYLAND MEDICAL SYSTEM CORP., ET AL.,
Defendants-Appellees-Cross-Appellants.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND, HON. DEBORAH K. CHASANOW
(No. 20-CV-2088)

**UNOPPOSED MOTION FOR LEAVE TO FILE SUPPLEMENTAL
APPENDIX**

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Defendants-Appellees-Cross-Appellants the University of Maryland St. Joseph Medical Center, LLC, UMSJ Health System, LLC, and the University of Maryland Medical System Corp. (collectively, “Defendants”) respectfully move, without opposition, for leave to file a Supplemental Appendix. After filing an opening and response brief, Defendants were informed by the Court that all referenced district court documents must be included in an appendix. Specifically, the following items were referenced in Defendants’ brief but were not included in the Joint Appendix:

- District Court Docket 47 (Plaintiff’s Memorandum of Law in Opposition to Defendants’ Motion to Dismiss).
- District Court Docket 105-1 (Memorandum of Law in Support of Plaintiff’s Cross-Motion for Summary Judgment and Opposition to Defendants’ Motion for Summary Judgment).
- District Court Docket 114 (Reply Memorandum of Law in Further Support of Plaintiff’s Cross-Motion for Summary Judgment).
- District Court Docket 134 (Joint Motion to Defer Filing of Motion Requesting Attorney’s Fees).

Defendants respectfully request leave to file a Supplemental Appendix to provide these documents. All of the items are matters of record, and good cause exists to file a Supplemental Appendix rather than insert these materials into the original Joint Appendix. If inserted into the original Joint Appendix, these materials would be scattered through two different volumes, and would require changes in both Plaintiff’s and Defendants’ citations.

Counsel for Defendants has conferred with counsel for Plaintiff, who consented to the requested leave.

Dated: January 23, 2025

Respectfully submitted,

/s/ Yaakov M. Roth

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CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limit of Federal Rule of Appellate Procedure 27(d)(2) because it contains 227 words. This motion complies with the typeface and type-style requirements of Federal Rule of Appellate Procedure 32(a)(5)-(6) because it was prepared in a proportionally spaced typeface using Microsoft Word in 14-point Georgia font.

Dated: January 23, 2025

/s/ Yaakov M. Roth
Yaakov M. Roth

*Counsel for Defendants-
Appellees-Cross-Appellants*

CERTIFICATE OF SERVICE

I hereby certify that, on this 23rd day of January 2025, I electronically filed the original of the foregoing document with the clerk of this Court by using the CM/ECF system. I certify that the participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Dated: January 23, 2025

/s/ Yaakov M. Roth
Yaakov M. Roth

*Counsel for Defendants-
Appellees-Cross-Appellants*